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ACTION 4/12

DUE DATE

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| NELSON, R.M. | | |
| PAULE, A.H. | | |
| BISHOP, M.L. | | |
| BRAINARD, B. | | |
| CANNON, G.R. | | |
| HARTMAN, J. | X | X |
| IZELL, K. | | |
| KAROL, M.S. | | |
| MCBRIDE, M.H. | | |
| SARGENT, D. | | |
| WITHERILL, H.F. | | |
| ADAMS, J.J. | | |
| ANDERSON, T.W. | | |
| CARUN, R.L. | | |
| DUFFY, G.G. | | |
| HOFFMAN, R.B. | | |
| LEVERNIER, R.J. | | |
| LOCKHART, F.A. | X | |
| LUKOW, T.E. | | |
| OLINGER, S. | | |
| RASK, W.C. | | |
| RUSCITTO, D.G. | | |
| SCHASSBURGER | X | X |
| BRACKEN, K.T. | | |
| GRETHEL, T. | | |
| HARGREAVES, M. | | |
| HICKS, D.A. | | |
| HUFFMAN, G.N. | | |
| MALCHESKI, D. | | |
| MCCORMICK, M.S. | | |
| MILLER, H.G. | | |
| OSTMEYER, R.M. | | |
| PEWITSCH, E. | | |
| POSILUSZNY, J. | | |
| RAMPE, J. | | |
| REECE, J. | | |
| STEWART, J.D. | | |
| VANDEARUY, M. | | |
| WALLIN, B. | | |

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NOTE: _____

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BY: _____ DATE: _____

RMK 4/12

Memorandum

APR 05 1993

EM-453.1 (J. Ciocco, 3-7459)

Review Comments for "Draft Environmental Evaluation Working Document for Phase I Work Plan, Operable Unit 4," January 1993

R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division, has reviewed the subject document and has prepared the attached comments for your consideration in preparing the final document. Please address these comments during the document finalization process.

Our first main concern with this document regards its attention to the two different ecological settings, inside and outside of the security fence, of Operable Unit (OU) 4. While the current plan recognizes these differences, it fails to address the different habitats, species, and potential exposure of ecological receptors to contaminants of these settings. These differences should be clearly defined in the plan because the data collected from these two areas will not be compatible.

Our second recommendation is that the initiation of the work documented in this plan should not be undertaken until a plan for conducting environmental evaluations has been developed. If the planned OU 9 activities are to be delayed, another plan of integration should be developed. This new plan should take into account the differences between the buffer zone and the industrial areas and should specifically discuss the coordination between studies conducted at different OU.

Please contact me at (301) 903-8191, or Jeff Ciocco of my staff at (301) 903-7459 if you have any questions regarding these comments.

Autar Rampertaap

Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/attachment:
J. Hartman, RF

cc w/o attachment:
R. Greenberg, EM-453

100-100000-10

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MAH 3-5

EM-453.1 DOCUMENT REVIEW: DRAFT ENVIRONMENTAL EVALUATION WORKING
DOCUMENT FOR PHASE I WORK PLAN, OPERABLE UNIT 4
ROCKY FLATS PLANT, GOLDEN, COLORADO
PUBLISHED: JANUARY 1993

GENERAL COMMENTS

1. The relationship between the investigation taking place at Operable Unit (OU) 6 and this investigation needs clarification. Reference is made that these two investigations will be "coordinated," but this coordination is never specifically addressed.
2. The references to the standard operating procedures (SOPs) do not appear to be complete. The document does not reference field documentation, decontamination, or waste handling SOPs, and the references to the Ecological Sampling SOP are not always complete.
3. The document indicates that preliminary surveys have been conducted, and habitat maps have already been constructed for this area. Please include this site-specific information as point of reference for planning this phase of work.

SPECIFIC COMMENTS

1. Section 2.0, page (p.) 2-2, first paragraph: Provide additional information regarding the coordination between the OU 6 environmental evaluation (EE) and this study. Especially, discuss whether the OU 6 EE will provide the data for the OU 4 EE with regards to the hillside area, which does not appear to be included within the scope of the OU 4 work.
2. Section 2.0, p. 2-2, third paragraph: Figure 3-1 shows that only the industrial area will be covered by the work described in this plan. Please clarify the extent of the area that will be evaluated as a result of this study because the first sentence states that the entire area of OU 4 will be included for investigation.
3. Section 3-1, p. 3-1, third paragraph: The OU 4 northern boundary extends beyond the perimeter road outside the security fence. There is no clearly defined area for this EE. The study perimeters should be clearly defined.
4. Section 3.2, p. 3-4, third paragraph: Figure 3-1 does not contain any building number designations so using building numbers does not help in locating where these marshy areas are in relationship to the study area. Figures should be clearly and completely notated.
5. Section 3.5, p. 3-5, fourth paragraph: This section does not seem to match the previous discussions on habitat and species present at the OU 4. Most of the discussion in this section focuses on the entire Rocky Flats Plant, there does not appear to be any OU 4 habitats or species of concern. Please clarify the purpose of this discussion.

6. Section 4.3, p. 4-3, second paragraph: Please provide the vegetative map showing the locations of habitats for the OU 4 area.
7. Section 4.4, p. 4-4, first paragraph: Please clarify the difference between the qualitative and quantitative sampling methods described in this paragraph. Also clarify what is meant by "greater than might be expected."
8. Section 4.4, p. 4-4, third paragraph: Please describe the inadvertently collected samples. Does this refer to animals accidentally killed as a result of the population analysis?
9. Section 4.5, p. 4-5, first paragraph: Please define the terminology "more complex than expected." Clarify what would constitute a more complex vegetative community that would result in conducting the quantitative survey.
10. Section 4.5, p. 4-5, second paragraph: The releve method does not appear to be described in SOP EE.10. Please reference where the releve procedure is described.
11. Section 4.5, p. 4-5, third paragraph: The last sentence of this paragraph is important in evaluating the effectiveness of this program. This sentence indicates that the hillside will be treated as a separate entity. This conflicts with the scope of the EE as shown on Figure 3-1, and as discussed in Section 2.0. Please present the geographical area of extent of this investigation clearly and consistently.
12. Section 5.0, p. 5-1, first paragraph: Please clarify the relationship of the ecotoxicological work to the field sampling. The determination of contaminants-of-concern must be based on the result of the characterization activities, not the habitat and species count as is implied in this paragraph.